

# **Plaintiffs' Exhibit 73**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

\_\_\_\_\_  
UNITED STATES, ) 1:23-cv-00108-LMB-JFA  
et al., )  
)  
Plaintiffs, )  
)  
vs. )  
)  
GOOGLE LLC, )  
)  
Defendants. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF

KENDALL OLIPHANT

August 9, 2023

9:32 a.m.

Reported by: Bonnie L. Russo  
Job No. 6031956

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<p style="text-align: right;">Page 30</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q. And --</p> <p>3 A. -- that would relate to paid media.</p> <p>4 Q. So am I understanding your testimony</p> <p>5 correctly that Deb made a comment to you that</p> <p>6 sometimes it's not good -- it's good not to be</p> <p>7 aware of things or be an expert in things and</p> <p>8 that that related to paid media; is that right?</p> <p>9 MS. ZWOLINSKI: Objection. Form.</p> <p>10 Foundation.</p> <p>11 THE WITNESS: It was an</p> <p>12 acknowledgement of the suit in that I was</p> <p>13 involved, and that's it. I am characterizing</p> <p>14 based on a vague menu -- I mean memory, just</p> <p>15 being honest.</p> <p>16 BY MS. GOODMAN:</p> <p>17 Q. Do you recall when this comment was</p> <p>18 made?</p> <p>19 A. I honestly don't.</p> <p>20 Q. And do you recall the context or the</p> <p>21 conversation in which it came up?</p> <p>22 MS. ZWOLINSKI: Objection. Form.</p>	<p style="text-align: right;">Page 32</p> <p>1 MS. ZWOLINSKI: Objection. Form.</p> <p>2 THE WITNESS: That I manage that</p> <p>3 order. I was the one that had the -- the most</p> <p>4 knowledge of it.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q. I see. Based on what you can recall</p> <p>7 sitting here today, is it correct or incorrect</p> <p>8 to say that the side comment that we're</p> <p>9 discussing came up in the context of a</p> <p>10 conversation with respect to who from the</p> <p>11 census bureau would be tasked with</p> <p>12 participating in this lawsuit?</p> <p>13 MS. ZWOLINSKI: Objection. Form.</p> <p>14 THE WITNESS: Can you repeat that,</p> <p>15 please.</p> <p>16 BY MS. GOODMAN:</p> <p>17 Q. Did the side comment that we're</p> <p>18 discussing -- and I am using "side comment" as</p> <p>19 a shorthand -- did that come up in the context</p> <p>20 of a conversation about who from the census</p> <p>21 bureau would participate in this lawsuit?</p> <p>22 A. I don't believe so. That's not -- I</p>
<p style="text-align: right;">Page 31</p> <p>1 THE WITNESS: I honestly don't. It</p> <p>2 was appropriate, but I can't recall what else</p> <p>3 was discussed.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. And did you understand her comment</p> <p>6 to mean that it's good for you not to</p> <p>7 necessarily be an expert in paid media or for</p> <p>8 who not be an expert in paid media?</p> <p>9 MS. ZWOLINSKI: Objection. Form.</p> <p>10 THE WITNESS: I would -- I can't</p> <p>11 assume what she thought. My interpretation was</p> <p>12 that she was not, so that -- I don't know. No</p> <p>13 one wants to be here.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q. Did you understand that in any way</p> <p>16 as to your expertise in paid media or...?</p> <p>17 MS. ZWOLINSKI: Objection. Form.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MS. GOODMAN:</p> <p>20 Q. And what did you understand her to</p> <p>21 mean with respect to your expertise in paid</p> <p>22 media?</p>	<p style="text-align: right;">Page 33</p> <p>1 don't -- that's not correct.</p> <p>2 Q. Okay. And just for the record, best</p> <p>3 recollection sitting here today, any more</p> <p>4 details about the context in which the side</p> <p>5 comment came up?</p> <p>6 A. Not that I can recall.</p> <p>7 Q. Okay. What is your title?</p> <p>8 A. Chief of the contract management --</p> <p>9 contract program office in the communications</p> <p>10 directorate of the census bureau.</p> <p>11 Q. And for how long have you held that</p> <p>12 position?</p> <p>13 A. Since October of 2021.</p> <p>14 Q. And prior to October 2021, what</p> <p>15 position did you hold at the census bureau?</p> <p>16 A. I was chief of the integrated</p> <p>17 communications, contract program management</p> <p>18 office.</p> <p>19 Q. And what time period did you hold</p> <p>20 the position of chief of the integrated</p> <p>21 communications, contract program management</p> <p>22 office?</p>

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<p>1 A. It began in 2016. I don't know the</p> <p>2 exact date or month, but it was through</p> <p>3 September of 2021.</p> <p>4 Q. With respect to your current role as</p> <p>5 chief of the contract management -- sorry. The</p> <p>6 contract program office and the communications</p> <p>7 directorate of the census bureau, do you</p> <p>8 understand the United States lawsuit to be</p> <p>9 based on any work you do in that role?</p> <p>10 MS. ZWOLINSKI: Objection. Form.</p> <p>11 THE WITNESS: I understand it to be</p> <p>12 based on work that was conducted in my previous</p> <p>13 role, not in my current role.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q. And so we'll focus our time here</p> <p>16 today on your time as the chief of the ICC</p> <p>17 contract program management office.</p> <p>18 A. ICC PMO.</p> <p>19 Q. ICC PMO?</p> <p>20 A. Yes.</p> <p>21 Q. All right. We'll use that</p> <p>22 shorthand. Thank you.</p>	<p>1 task orders under the main contract?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: For context only -- I</p> <p>4 am trying to figure out how best to explain.</p> <p>5 In terms of government contracts,</p> <p>6 management of a contract is actually done --</p> <p>7 you have a contracting officer who is</p> <p>8 ultimately responsible for the contract, and</p> <p>9 they can make decisions that impact scope.</p> <p>10 But then you have a contracting</p> <p>11 officer representative, or COR, who</p> <p>12 administers the contract.</p> <p>13 The communications contract was so</p> <p>14 large, you had a COR that administered the</p> <p>15 master contract and was ultimately responsible</p> <p>16 for all the -- all the orders, but each order</p> <p>17 had a separate COR.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. I am following you.</p> <p>20 A. Okay.</p> <p>21 Q. In your role, however, in terms of</p> <p>22 program management of the master contract, did</p>
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<p>1 To whom did you report when you were</p> <p>2 chief of the ICC PMO?</p> <p>3 A. Originally I directly reported to</p> <p>4 Stephen Buckner. He was the assistant director</p> <p>5 for communications.</p> <p>6 And then I reported to Burton Reist,</p> <p>7 who was the other assistant director for</p> <p>8 communications. We had two.</p> <p>9 Q. And in your role as chief, who</p> <p>10 reported to you?</p> <p>11 A. I had a staff of approximately 15,</p> <p>12 16 people at any given time.</p> <p>13 Q. What -- describe your job</p> <p>14 responsibilities as chief of the ICC PMO.</p> <p>15 A. I oversaw all things related to -- I</p> <p>16 oversaw the communications contract not as the</p> <p>17 contracting officer's representative but as the</p> <p>18 program officer as well as anything related to</p> <p>19 it. That included program management reports,</p> <p>20 stakeholder engagement, budget, et cetera.</p> <p>21 Q. And did your role as chief of the</p> <p>22 ICC PMO include responsibilities for all of the</p>	<p>1 you have responsibility for managing all of the</p> <p>2 orders issued under that master contract?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 THE WITNESS: I had the</p> <p>5 responsibility of understanding and providing</p> <p>6 guidance and reporting up and down and out, but</p> <p>7 I did not have responsibility for managing the</p> <p>8 orders. Only the COR on the contract can</p> <p>9 manage the orders.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q. Okay. Sitting here today, what --</p> <p>12 what's your understanding of which task orders</p> <p>13 are relevant to the lawsuit brought by the</p> <p>14 United States?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 Foundation.</p> <p>17 THE WITNESS: Order 8, which was</p> <p>18 recruitment advertising, and Order 15, which</p> <p>19 was media planning and buying.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q. And what were your responsibilities</p> <p>22 with respect to Order 8?</p>

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<p>1 Q. Prime contractor?</p> <p>2 A. Just prime contractor. That's easy.</p> <p>3 Q. Okay. And we'll refer to Young &amp;</p> <p>4 Rubicam which is also known as VMLY&amp;R as the</p> <p>5 prime contractor?</p> <p>6 A. Prime or Y&amp;R, whichever works for</p> <p>7 you.</p> <p>8 Q. Y&amp;R?</p> <p>9 A. Yeah.</p> <p>10 Q. And various task orders were issued</p> <p>11 under the master contract, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And Order 15 which relates to paid</p> <p>14 media, that was also issued to Y&amp;R, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And Order 8 under the master</p> <p>17 contract, which relates to recruiting of census</p> <p>18 workers, that was also issued to Y&amp;R, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Order 15, describe for me at</p> <p>21 a high level what Order 15 covers.</p> <p>22 A. Order 15 covered the development of</p>	<p>1 already as part of their team with the</p> <p>2 understanding that each contractor had a role.</p> <p>3 You had a number of contractors that were</p> <p>4 audience-specific and they were required --</p> <p>5 their role was to create communications to</p> <p>6 reach their audience because that was their</p> <p>7 specialty, and in some cases, they also bought</p> <p>8 media.</p> <p>9 Most of the media they purchased was</p> <p>10 local and hyper local. Y&amp;R, the agency itself,</p> <p>11 did not buy media. They brought subcontractors</p> <p>12 on to plan and purchase the media.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q. And that was permitted under Order</p> <p>15 15, correct?</p> <p>16 A. Yes, it was.</p> <p>17 Q. And as a result, the census bureau</p> <p>18 did not contract directly with any of the</p> <p>19 subcontractors or entities who were purchasing</p> <p>20 the media; is that correct?</p> <p>21 MS. ZWOLINSKI: Objection. Form.</p> <p>22 THE WITNESS: The census bureau</p>
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<p>1 the media strategy, plans, purchasing -- I am</p> <p>2 looking forward, strategy, plan, purchasing and</p> <p>3 evaluation. By evaluation, that is comparing</p> <p>4 planned versus actual.</p> <p>5 Q. When you say "planned versus</p> <p>6 actual," are you referring to planned media</p> <p>7 spend as compared to actual media spend?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And did Order 15 contemplate</p> <p>10 Y&amp;R entering into subcontracting relationships?</p> <p>11 MS. ZWOLINSKI: Objection. Form.</p> <p>12 THE WITNESS: For context. When the</p> <p>13 communications contract was competed, Y&amp;R --</p> <p>14 when they were awarded the contract, the</p> <p>15 contract -- they came with their entire team in</p> <p>16 place.</p> <p>17 The RFP for the contract</p> <p>18 specifically requested the ability to create</p> <p>19 messaging to reach numerous languages in their</p> <p>20 native tongue.</p> <p>21 The previous census -- well -- so</p> <p>22 Y&amp;R came to the table with their contractors</p>	<p>1 contracted with Y&amp;R and to -- to perform all</p> <p>2 the requirements under the communications</p> <p>3 contract, which included planning and</p> <p>4 purchasing media. As such, Y&amp;R contracted --</p> <p>5 subcontracted with other agencies to assist</p> <p>6 them. They were purchasing media on behalf of</p> <p>7 the census bureau.</p> <p>8 BY MS. GOODMAN:</p> <p>9 Q. And so those other agencies who were</p> <p>10 purchasing media on behalf of the census</p> <p>11 bureau, with respect to those agencies, there</p> <p>12 is no contract between the census bureau and</p> <p>13 those agencies who were purchasing media on</p> <p>14 behalf of the census bureau, correct?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: No direct contracts,</p> <p>17 yes, correct.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. And so after the master contract was</p> <p>20 awarded, the communications contract, I think</p> <p>21 you also referred to it, then Order 15 was</p> <p>22 agreed to; is that correct?</p>

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<p>1 MS. ZWOLINSKI: Objection. Form.</p> <p>2 THE WITNESS: Yes. It was awarded.</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q. And that was also as awarded to</p> <p>5 Young &amp; Rubicam?</p> <p>6 A. For context. The prime contract was</p> <p>7 awarded to Young &amp; Rubicam, and thus, all</p> <p>8 orders under the prime contract are</p> <p>9 automatically awarded to Young &amp; Rubicam.</p> <p>10 Q. And Order 15 pertains to media</p> <p>11 planning and buying, correct?</p> <p>12 A. Correct.</p> <p>13 Q. And so by virtue of Order 15,</p> <p>14 pertaining to media planning and buying being</p> <p>15 awarded to Young &amp; Rubicam, there was no</p> <p>16 separate order between the census bureau and</p> <p>17 any other agency on whose -- who was making</p> <p>18 paid media purchases, correct?</p> <p>19 MS. ZWOLINSKI: Objection. Form.</p> <p>20 THE WITNESS: Correct.</p> <p>21 BY MS. GOODMAN:</p> <p>22 Q. And as part of agreeing to Order 15</p>	<p>1 Q. So I am going to hand you what I</p> <p>2 have marked as Exhibit 14,</p> <p>3 CENSUS-ADS-0000387420 through 387490.</p> <p>4 And take a look at it, and just --</p> <p>5 can you confirm for me that this is the</p> <p>6 technical proposal that Y&amp;R submitted for Order</p> <p>7 15?</p> <p>8 Ms. Oliphant, you see the first page</p> <p>9 says: "Integrated communication contract,</p> <p>10 revised technical proposal, Version 2, October</p> <p>11 5, 2018"?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Okay. Any reason to doubt that this</p> <p>14 is the technical proposal submitted by Y&amp;R?</p> <p>15 A. I have no doubt this is the</p> <p>16 technical proposal submitted from Y&amp;R. For</p> <p>17 context, every -- multiple technical proposals</p> <p>18 were received as additional work was added. I</p> <p>19 am verifying this was for the first initial</p> <p>20 technical proposal.</p> <p>21 Q. Okay.</p> <p>22 A. That's --</p>
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<p>1 with Y&amp;R, they had to complete a technical</p> <p>2 proposal; is that correct?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 THE WITNESS: That is correct.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q. And what does the technical proposal</p> <p>7 entail?</p> <p>8 A. The government, the census bureau in</p> <p>9 this case, defines the requirements. The</p> <p>10 requirements are shared with Y&amp;R and they</p> <p>11 provide a proposal in response to those</p> <p>12 requirements.</p> <p>13 The census bureau or the government</p> <p>14 reviews their proposal to make sure it's in</p> <p>15 line with the requirements. If negotiations</p> <p>16 are required, they are done between the</p> <p>17 contractor, the contracting officer -- Y&amp;R, the</p> <p>18 contracting officer and the CORs before a final</p> <p>19 proposal is accepted.</p> <p>20 (Deposition Exhibit 14 was marked</p> <p>21 for identification.)</p> <p>22 BY MS. GOODMAN:</p>	<p>1 Q. And sitting here today, do you</p> <p>2 recall technical proposals issued with respect</p> <p>3 to Order 15 after October 5, 2018?</p> <p>4 A. Yes. They would -- ideally, they</p> <p>5 would be considered modifications, so it would</p> <p>6 be -- if we wanted to do additional work for</p> <p>7 some reason that was in scope of the order but</p> <p>8 was in addition to what had already been</p> <p>9 planned, approved and funded, Y&amp;R would -- we</p> <p>10 would have to provide the requirements to Y&amp;R.</p> <p>11 They would still have to provide a</p> <p>12 technical and a price proposal. We would still</p> <p>13 go through the same process. It should be</p> <p>14 adequately or appropriately marked. I am just</p> <p>15 making sure.</p> <p>16 Q. Okay. I want to direct your</p> <p>17 attention to Page 6 of this document,</p> <p>18 Bates-labeled 25 at the end.</p> <p>19 A. Uh-huh.</p> <p>20 Q. And in the first full paragraph</p> <p>21 beginning: "Supplementing these workshops."</p> <p>22 Do you see where I am?</p>

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<p style="text-align: right;">Page 82</p> <p>1 A. Yes.</p> <p>2 Q. Sort of in the middle of the</p> <p>3 paragraph, it says: "Team Y&amp;R, small business</p> <p>4 media buying agencies and WaveMaker also</p> <p>5 determined there was a need to align around a</p> <p>6 single planning platform to consolidate</p> <p>7 efforts, eliminate redundancies and achieve</p> <p>8 optimal performance."</p> <p>9 Do you know what the single planning</p> <p>10 platform around which Team Y&amp;R proposed</p> <p>11 aligning?</p> <p>12 A. In the very next paragraph, it</p> <p>13 states that: "They decided to align around</p> <p>14 WaveMakers, establish three phase, ten stage,</p> <p>15 37 step media planning, buying and activation</p> <p>16 process, that reflects industry best practices</p> <p>17 for campaigns of this size and complexity."</p> <p>18 Q. Okay. So are -- do you understand</p> <p>19 in the previous paragraph, the single planning</p> <p>20 platform to be a reference to that three phase,</p> <p>21 ten stage, 37 step media planning, buying and</p> <p>22 activation process?</p>	<p style="text-align: right;">Page 84</p> <p>1 THE WITNESS: Extremely.</p> <p>2 BY MS. GOODMAN:</p> <p>3 Q. And why did you view it as extremely</p> <p>4 informative?</p> <p>5 A. Because other than myself, no one in</p> <p>6 the room had any experience with purchasing</p> <p>7 paid media under a communications contract.</p> <p>8 Q. And prior -- strike that.</p> <p>9 Did you, yourself, at this time have</p> <p>10 any knowledge or awareness with respect to how</p> <p>11 the paid media industry buying -- strike that.</p> <p>12 Did you -- at this time in October</p> <p>13 of 2018, did you know how paid media purchasing</p> <p>14 worked?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: I have a -- I had a</p> <p>17 good working knowledge.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. Okay. And was that from the 2010</p> <p>20 census?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So you see the first bullet</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Yes.</p> <p>2 Q. Okay. On page -- let's turn to Page</p> <p>3 10, Bates ending in 29.</p> <p>4 You see the reference to the Media</p> <p>5 101 workshop?</p> <p>6 A. Yes.</p> <p>7 Q. What was the Media 101 workshop?</p> <p>8 A. For context. The census bureau does</p> <p>9 not purchase media. Everyone involved in</p> <p>10 anything related to media under this contract,</p> <p>11 not everyone had experience or understood the</p> <p>12 process.</p> <p>13 The workshop provided that</p> <p>14 information so that everybody was -- most of us</p> <p>15 were on a level playing field in terms of basic</p> <p>16 understanding of what it took to -- what goes</p> <p>17 into planning and purchasing media.</p> <p>18 Q. And did you attend the Media 101</p> <p>19 workshop?</p> <p>20 A. Yes.</p> <p>21 Q. Did you view it as informative?</p> <p>22 MS. ZWOLINSKI: Objection. Form.</p>	<p style="text-align: right;">Page 85</p> <p>1 point under Media 101 workshop?</p> <p>2 A. Yes.</p> <p>3 Q. And it says: "The workshop is</p> <p>4 designed to provide the most up-to-date</p> <p>5 information on industry offerings, practices</p> <p>6 and metrics."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. And in your view, did the Media 101</p> <p>10 workshop in fact provide the most up-to-date</p> <p>11 information on industry offerings, practices</p> <p>12 and metrics?</p> <p>13 A. As of that date, yes.</p> <p>14 Q. Okay. And then the last paragraph</p> <p>15 under Media 101 where it says: "The workshop</p> <p>16 will include."</p> <p>17 You see that it says: "The workshop</p> <p>18 will include presentations on" -- and I am</p> <p>19 skipping to the second sentence, "digital media</p> <p>20 channels, the media planning and buying</p> <p>21 process, media forms and templates and media</p> <p>22 stewardship."</p>



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<p>1 A. Yes.</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q. Did -- what is your understanding of</p> <p>5 the term "digital media channels" here?</p> <p>6 A. In this workshop, they explained the</p> <p>7 different types of media, the reach, any</p> <p>8 limitations to the reach, how they worked</p> <p>9 together to provide a holistic approach to</p> <p>10 encouraging response.</p> <p>11 So in terms of digital media</p> <p>12 channels, they -- without going into a lot of</p> <p>13 detail, discussed site direct and what that</p> <p>14 meant, programmatic, social, and paid search.</p> <p>15 And explained that -- that's pretty much it.</p> <p>16 Q. And let's turn to Page 14, Bates</p> <p>17 ending in 33.</p> <p>18 At the bottom where it begins:</p> <p>19 "Digital advertising," do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. The first sentence says:</p> <p>22 "Team Y&amp;R partner Reingold will assess factors</p>	<p>1 more. That's what they discussed in this</p> <p>2 document.</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q. And do you see the paragraph: "Team</p> <p>5 Y&amp;R will centralize as much of its national</p> <p>6 programmatic display video and search campaigns</p> <p>7 within" -- "within one advertising tech stack."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know whether this occurred?</p> <p>11 A. As far -- as far as I'm aware, it</p> <p>12 was.</p> <p>13 Q. And do you know what ad tech stack</p> <p>14 was utilized?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: I do not recall.</p> <p>17 MS. GOODMAN:</p> <p>18 Q. And do you know if it was --</p> <p>19 involved any Google products or services?</p> <p>20 A. I don't recall.</p> <p>21 Q. Is that something that would have</p> <p>22 been important to you in your role as the</p>
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<p>1 for digital media options identifying metrics</p> <p>2 such as cost of serving, reach, and expected</p> <p>3 engagement for cross team Y&amp;R review."</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Why were the metrics of cost</p> <p>7 of serving, reach, and expected engagement</p> <p>8 factors that Reingold would need to assess as</p> <p>9 it is making purchases under Order 15?</p> <p>10 MS. ZWOLINSKI: Objection. Form.</p> <p>11 THE WITNESS: It was Reingold's job,</p> <p>12 as was Y&amp;R and all subcontractors, to make sure</p> <p>13 that everything they did and every purchase</p> <p>14 they made was as efficient and effective as</p> <p>15 possible. So every data point they could use</p> <p>16 to ensure that, they did.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. And those were the factors listed</p> <p>19 here that were assessed for all types of</p> <p>20 digital media; is that correct?</p> <p>21 MS. ZWOLINSKI: Objection. Form.</p> <p>22 THE WITNESS: There may have been</p>	<p>1 contracting officer representative on Order 15?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: That level of detail,</p> <p>4 no.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q. Okay. And if you turn to Page 30</p> <p>7 ending in Bates 49, I want to direct your</p> <p>8 attention to this little flow chart in the</p> <p>9 middle of the page.</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Was that process -- strike that.</p> <p>13 It is titled: "Census Bureau 2010</p> <p>14 Media Billing Process."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Is this the same process that was</p> <p>18 filed -- followed for the 2020 census media</p> <p>19 billing process?</p> <p>20 A. For the most part, yes.</p> <p>21 Q. When you say "for the most part,"</p> <p>22 what was different about billing processes in</p>



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<p style="text-align: right;">Page 94</p> <p>1 and how they're classified.</p> <p>2 Q. Would it also be accurate to refer</p> <p>3 to these different channels as different kind</p> <p>4 of types of products?</p> <p>5 MS. ZWOLINSKI: Objection. Form.</p> <p>6 THE WITNESS: I don't know that I</p> <p>7 would consider them products.</p> <p>8 BY MS. GOODMAN:</p> <p>9 Q. Why not?</p> <p>10 A. Because within each there is so</p> <p>11 much. Print is a category. Out of home is a</p> <p>12 category. Paid social is a category. They are</p> <p>13 not products themselves.</p> <p>14 Q. But -- okay. Within paid social</p> <p>15 what are the options that you're referring to?</p> <p>16 A. Well, there are examples given here</p> <p>17 on the page: Social sharing platforms, chat</p> <p>18 apps, those are options. Those are other --</p> <p>19 you know, different options within paid social,</p> <p>20 and those are just a couple of options. Every</p> <p>21 day options increase --</p> <p>22 Q. Okay.</p>	<p style="text-align: right;">Page 96</p> <p>1 those that have been paid for. They are paid</p> <p>2 to move up to the top.</p> <p>3 So -- or you want to make sure -- so</p> <p>4 when we want it -- we wanted everything we did,</p> <p>5 anything that had census -- a question about</p> <p>6 census, we wanted the census bureau to pop up.</p> <p>7 So it could be a million and one different</p> <p>8 terms, but those terms triggered -- I don't</p> <p>9 know what you call it -- in the list that the</p> <p>10 census site is the first site that you go to.</p> <p>11 Q. Okay. So what -- I want to re-ask a</p> <p>12 question I think I already asked, but see if I</p> <p>13 can get a different answer, which is: What are</p> <p>14 the kinds of different options by name, by</p> <p>15 type, by provider within the programmatic</p> <p>16 category?</p> <p>17 MS. ZWOLINSKI: Objection. Form.</p> <p>18 THE WITNESS: I don't know.</p> <p>19 BY MS. GOODMAN:</p> <p>20 Q. Did you have occasion to learn those</p> <p>21 throughout -- learn the various options within</p> <p>22 that category during your time as COR for Order</p>
<p style="text-align: right;">Page 95</p> <p>1 A. -- in all of these categories.</p> <p>2 Q. And how about with respect to</p> <p>3 programmatic? What are the options that you</p> <p>4 understand to be available within that</p> <p>5 category?</p> <p>6 MS. ZWOLINSKI: Objection. Form.</p> <p>7 THE WITNESS: Within programmatic on</p> <p>8 this particular page, it really just gives you</p> <p>9 an idea of what programmatic is. It doesn't</p> <p>10 get into any of the options so when you're</p> <p>11 talking to somebody and you say programmatic</p> <p>12 versus paid search, you understand what the</p> <p>13 difference is between the two.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q. And what are the differences between</p> <p>16 the two?</p> <p>17 A. My understanding is with paid search</p> <p>18 you are actually choosing search terms that you</p> <p>19 are paying for -- so when I am searching for</p> <p>20 something, no matter what platform I am on,</p> <p>21 what comes to the top of my search, the</p> <p>22 responses to my query, the very top entries are</p>	<p style="text-align: right;">Page 97</p> <p>1 15?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: No. What we learned</p> <p>4 is the different -- that there is a difference</p> <p>5 between these, and working together, they help</p> <p>6 extend our message. All of these are</p> <p>7 components of what were required for us to</p> <p>8 reach -- our goal was to reach almost</p> <p>9 everybody. We had a very short time frame, and</p> <p>10 we didn't -- we had to use every possible tool</p> <p>11 there was.</p> <p>12 So programmatic did not replace --</p> <p>13 replace paid search, did not replace digital,</p> <p>14 did not replace paid social, did not replace</p> <p>15 any of these. They all worked together like a</p> <p>16 team.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. And how did they -- how did you --</p> <p>19 how did the census bureau, from your point of</p> <p>20 view, execute on making sure that they worked</p> <p>21 together to reach all Americans to participate</p> <p>22 in the census?</p>

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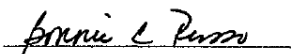
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<p style="text-align: right;">Page 98</p> <p>1 MS. ZWOLINSKI: Objection. Form.</p> <p>2 THE WITNESS: Well, we start with a</p> <p>3 media plan. The ad agency provides a</p> <p>4 recommended media plan based upon the agreed</p> <p>5 upon strategies that we've all come to agree</p> <p>6 upon.</p> <p>7 All the agencies purchasing media</p> <p>8 present the media plan to the census bureau.</p> <p>9 We evaluate it. We ask questions. We provide</p> <p>10 comments. Revisions are made based upon those.</p> <p>11 A final media plan is approved, and we -- while</p> <p>12 it is just a plan, it is an iterative plan that</p> <p>13 forms the base of what we do, and as needed, we</p> <p>14 will add to it.</p> <p>15 Every -- if you are blasting the</p> <p>16 message, all of these work. But as you move</p> <p>17 further into the actual event, there may be</p> <p>18 segments of the population or segments of the</p> <p>19 country that are not responding at the rate</p> <p>20 that you anticipated. So you go back into your</p> <p>21 tool chest to determine what is the best tool</p> <p>22 to use to help encourage, and that tool may not</p>	<p style="text-align: right;">Page 100</p> <p>1 But with respect to paid media,</p> <p>2 would you -- sorry.</p> <p>3 During the course of the execution</p> <p>4 of the campaign, did you make adjustments from</p> <p>5 moving money spent from one category to another</p> <p>6 category in order to reach your goal of</p> <p>7 targeting whichever particular audience you</p> <p>8 were not seeing the response rate from?</p> <p>9 MS. ZWOLINSKI: Objection. Form.</p> <p>10 THE WITNESS: In terms of moving</p> <p>11 from one category to another, can you be more</p> <p>12 specific.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q. So if programmatic advertising was</p> <p>15 not delivering the result that you were hoping</p> <p>16 to see in terms of reach, would you shift some</p> <p>17 of the money spent on programmatic advertising</p> <p>18 to another category such as paid search,</p> <p>19 digital, or paid social?</p> <p>20 MS. ZWOLINSKI: Objection. Form.</p> <p>21 Foundation.</p> <p>22 THE WITNESS: So when we approve</p>
<p style="text-align: right;">Page 99</p> <p>1 be paid media. It may be boots on the ground,</p> <p>2 which is not included in this because it's not</p> <p>3 paid media.</p> <p>4 But we had a lot of tools in our</p> <p>5 chest. So we would determine if there were --</p> <p>6 you know, paid -- use site directory, you go</p> <p>7 directly to a site. What is the -- what is</p> <p>8 the -- so we created -- we segmented the</p> <p>9 audience. We had an audience segmentation. We</p> <p>10 did a lot of research around messaging, and we</p> <p>11 took all that research, and we had an ongoing</p> <p>12 survey.</p> <p>13 We took all of that information. We</p> <p>14 talked to the people on the ground, and we</p> <p>15 determined if we needed to change anything and</p> <p>16 how -- what that change included.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. And so with respect to -- let's try</p> <p>19 to focus only on paid media --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- understanding there are many</p> <p>22 other tools.</p>	<p style="text-align: right;">Page 101</p> <p>1 spending -- and I'm sure you have looked at the</p> <p>2 media authorization forms because we had an</p> <p>3 example previously -- it is by audience, and</p> <p>4 there are funds allocated to the different</p> <p>5 media -- media channel options.</p> <p>6 In terms of digital, it is broken</p> <p>7 out by paid search -- paid social, site direct,</p> <p>8 paid search, and programmatic. We approve the</p> <p>9 total amount on that form for digital, and as</p> <p>10 we are evaluating effectiveness if there is --</p> <p>11 if we find that a particular audience is more</p> <p>12 predisposed to one type versus another, we do</p> <p>13 have that ability to move money.</p> <p>14 I can't necessarily say how often</p> <p>15 that happened because we normally within the</p> <p>16 bureau and within the presentations for the</p> <p>17 most part, we talk about digital as a whole.</p> <p>18 We don't talk about the differences between the</p> <p>19 categories. We want our ad agencies to use the</p> <p>20 options in the digital tool chest as</p> <p>21 appropriately as possible to help us reach our</p> <p>22 goal.</p>

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<p style="text-align: right;">Page 102</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q. Now, you said within the bureau you</p> <p>3 talk about digital as a whole. Why is that?</p> <p>4 MS. ZWOLINSKI: Objection. Form.</p> <p>5 THE WITNESS: Because most people</p> <p>6 don't care about the difference. We -- we are</p> <p>7 not media buyers. We are looking at</p> <p>8 categories.</p> <p>9 So the vast people -- unless you are</p> <p>10 right up in this, and even if people who were</p> <p>11 right close to it, we didn't evaluate each</p> <p>12 individual piece of digital, right. We're like</p> <p>13 would digital work.</p> <p>14 We might ask whether or not we need</p> <p>15 to adjust our search terms. You might -- that</p> <p>16 might be a conversation, but -- or do we need</p> <p>17 to put more in social but in terms of site</p> <p>18 direct and programmatic, that fell within the</p> <p>19 digital moniker.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q. And so from your point of view, were</p> <p>22 site direct and programmatic sort of -- not</p>	<p style="text-align: right;">Page 104</p> <p>1 more, correct?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: For context most</p> <p>4 people have no idea where they get their</p> <p>5 messages. So you cannot rely on one form of</p> <p>6 media for the message to seed. You've got to</p> <p>7 surround them with the messaging so that the</p> <p>8 first few times it may not really click.</p> <p>9 You've watched a commercial. It may</p> <p>10 be four -- the fourth time you heard that</p> <p>11 commercial before something in it makes you</p> <p>12 really look up and pay attention, or you might</p> <p>13 like something in the commercial but still not</p> <p>14 know what that commercial is advertising</p> <p>15 because you're only focused on one piece.</p> <p>16 In order to effectively reach the</p> <p>17 number of people that we needed to reach and --</p> <p>18 and -- and -- and -- and -- and -- and -- and</p> <p>19 encourage response for a complete census, we</p> <p>20 needed a holistic -- we needed a holistic</p> <p>21 approach. We needed to hit them -- serve</p> <p>22 messaging from every possible angle.</p>
<p style="text-align: right;">Page 103</p> <p>1 that they were the same thing, but you thought</p> <p>2 about them in the same way?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 THE WITNESS: We did not think about</p> <p>5 them. We trusted our ad agencies to -- once we</p> <p>6 had approved the plan, to reach our audience</p> <p>7 the best way they could within that plan,</p> <p>8 within the -- within the integrity of the plan</p> <p>9 or the spirit of the plan.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q. If you turn to Page 13 of the deck,</p> <p>12 Bates ending 44. Is it fair to say that this</p> <p>13 slide shows that what matters to the census</p> <p>14 bureau is reaching a consumer wherever they may</p> <p>15 be found?</p> <p>16 MS. ZWOLINSKI: Objection. Form.</p> <p>17 THE WITNESS: That is safe to say.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. And so just as you might reach a</p> <p>20 consumer through a display banner in the first</p> <p>21 bullet, you also need to consider whether you</p> <p>22 can reach them by Googling a product to learn</p>	<p style="text-align: right;">Page 105</p> <p>1 And so you get up in the morning.</p> <p>2 It might be on the morning news, or it might be</p> <p>3 a commercial -- it might be a story on the</p> <p>4 morning news, right. That's earned media. For</p> <p>5 paid media it may be on TV. It might be -- you</p> <p>6 might be -- if -- it all depends on how you</p> <p>7 take your media, how you receive your media.</p> <p>8 That's where it hits you the most. But I can't</p> <p>9 count on that being the only source of you</p> <p>10 accepting the message.</p> <p>11 BY MS. GOODMAN:</p> <p>12 Q. And turning to Page 17 ending in 48,</p> <p>13 how -- how is the optical -- strike that.</p> <p>14 I am reading in the second bullet</p> <p>15 where it begins: "Paid media." My question</p> <p>16 is: How is the optimal mix for efficient and</p> <p>17 effective performance for paid media determined</p> <p>18 for the -- you know, as census was executing on</p> <p>19 the 2020 campaign?</p> <p>20 MS. ZWOLINSKI: Objection. Form.</p> <p>21 THE WITNESS: So as the sentence</p> <p>22 reads, we have many research tools and</p>

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<p>1 provided you legal advice?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. Okay. And is your answer the same</p> <p>6 in January of 2023?</p> <p>7 MS. ZWOLINSKI: Objection. Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. GOODMAN:</p> <p>10 Q. Okay. And in the course of your</p> <p>11 participation in this lawsuit if you've had</p> <p>12 questions about your participation in this</p> <p>13 lawsuit, have you turned to the attorneys at</p> <p>14 the antitrust division with your questions?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. To whom have you turned, if anyone?</p> <p>19 A. Commerce.</p> <p>20 Q. And is that Mr. Cannon?</p> <p>21 A. That's Mr. Cannon, yes.</p> <p>22 Q. Do you consider the lawyers for the</p>	<p>1 MS. GOODMAN: I have no further</p> <p>2 questions. I'll pass the witness.</p> <p>3 MS. ZWOLINSKI: We have no</p> <p>4 questions.</p> <p>5 MS. GOODMAN: Okay. Thank you so</p> <p>6 much for your time, Ms. Oliphant. I very much</p> <p>7 appreciate it.</p> <p>8 THE WITNESS: You're welcome. Thank</p> <p>9 you.</p> <p>10 THE VIDEOGRAPHER: Off the record.</p> <p>11 MS. GOODMAN: Yes.</p> <p>12 THE VIDEOGRAPHER: This marks the</p> <p>13 end of the deposition of Kendall Oliphant. We</p> <p>14 are going off the record at 18:24.</p> <p>15 (Whereupon, the proceeding was</p> <p>16 concluded at 6:24 p.m.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
Page 335	Page 337
<p>1 antitrust division to be lawyers for the census</p> <p>2 bureau?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 Foundation.</p> <p>5 THE WITNESS: I do not.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q. Why not?</p> <p>8 MS. ZWOLINSKI: Objection. Form.</p> <p>9 Foundation.</p> <p>10 THE WITNESS: Since census has their</p> <p>11 own lawyers and we have commerce lawyers, and I</p> <p>12 believe the commerce lawyers would be more --</p> <p>13 more sort of categorized in that way versus</p> <p>14 DOJ.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q. Okay. And is your answer the same</p> <p>17 with respect to your participation in this</p> <p>18 lawsuit as a representative of the census</p> <p>19 bureau?</p> <p>20 MS. ZWOLINSKI: Objection. Form.</p> <p>21 Foundation.</p> <p>22 THE WITNESS: Yes.</p>	<p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, Bonnie L. Russo, the officer before</p> <p>3 whom the foregoing deposition was taken, do</p> <p>4 hereby certify that the witness whose testimony</p> <p>5 appears in the foregoing deposition was duly</p> <p>6 sworn by me; that the testimony of said witness</p> <p>7 was taken by me in shorthand and thereafter</p> <p>8 reduced to computerized transcription under my</p> <p>9 direction; that said deposition is a true</p> <p>10 record of the testimony given by said witness;</p> <p>11 that I am neither counsel for, related to, nor</p> <p>12 employed by any of the parties to the action in</p> <p>13 which this deposition was taken; and further,</p> <p>14 that I am not a relative or employee of any</p> <p>15 attorney or counsel employed by the parties</p> <p>16 hereto, nor financially or otherwise interested</p> <p>17 in the outcome of the action.</p> <p>18</p> <p>19 </p> <p>20 Notary Public in and for</p> <p>21 the District of Columbia</p> <p>22 My Commission expires: August 14, 2025</p>

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<p style="text-align: right;">Page 338</p> <p>1           ACKNOWLEDGMENT OF DEPONENT</p> <p>2       I, KENDALL OLIPHANT, do hereby certify that</p> <p>3       I have read the foregoing transcript of my</p> <p>4       testimony taken on 8/9/23, and further certify</p> <p>5       that it is a true and accurate record of my</p> <p>6       testimony (with the exception of the</p> <p>7       corrections listed below):</p> <table border="0"><tr><td>8   Page</td><td>Line</td><td>Correction</td></tr><tr><td>9   ____</td><td>____</td><td>_____</td></tr><tr><td>10  ____</td><td>____</td><td>_____</td></tr><tr><td>11  ____</td><td>____</td><td>_____</td></tr><tr><td>12  ____</td><td>____</td><td>_____</td></tr><tr><td>13  ____</td><td>____</td><td>_____</td></tr><tr><td>14  ____</td><td>____</td><td>_____</td></tr><tr><td>15  ____</td><td>____</td><td>_____</td></tr><tr><td>16  ____</td><td>____</td><td>_____</td></tr><tr><td>17  ____</td><td>____</td><td>_____</td></tr></table> <p>18           _____</p> <p>          KENDALL OLIPHANT</p> <p>19</p> <p>          SUBSCRIBED AND SWORN TO BEFORE ME</p> <p>20       THIS ____ DAY OF _____, 2023.</p> <p>21</p> <p>22       _____ (NOTARY PUBLIC)   MY COMMISSION EXPIRES:           Job No. CS6031956</p>	8   Page	Line	Correction	9   ____	____	_____	10  ____	____	_____	11  ____	____	_____	12  ____	____	_____	13  ____	____	_____	14  ____	____	_____	15  ____	____	_____	16  ____	____	_____	17  ____	____	_____	
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<p style="text-align: right;">Page 339</p> <p>1   Rachel Zwolinski, Esq.</p> <p>2   rachel.zwolinski@usdoj.gov</p> <p>3           August 10, 2023</p> <p>4   RE:   United States, Et Al v. Google, LLC</p> <p>5       8/9/2023, Kendall Oliphant (#6031956)</p> <p>6       The above-referenced transcript is available for</p> <p>7       review.</p> <p>8       Within the applicable timeframe, the witness should</p> <p>9       read the testimony to verify its accuracy. If there are</p> <p>10      any changes, the witness should note those with the</p> <p>11      reason, on the attached Errata Sheet.</p> <p>12      The witness should sign the Acknowledgment of</p> <p>13      Deponent and Errata and return to the deposing attorney.</p> <p>14      Copies should be sent to all counsel, and to Veritext at</p> <p>15      erratas-cs@veritext.com</p> <p>16</p> <p>17      Return completed errata within 30 days from</p> <p>18      receipt of testimony.</p> <p>19      If the witness fails to do so within the time</p> <p>20      allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22           Yours,</p> <p>23           Veritext Legal Solutions</p> <p>24</p> <p>25</p>																															

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ACKNOWLEDGMENT OF DEPONENT

I, KENDALL OLIPHANT, do hereby certify that I have read the foregoing transcript of my testimony taken on 8/9/23, and further certify that it is a true and accurate record of my testimony (with the exception of the corrections listed below):

Page	Line	Correction
<u>33</u>	<u>7</u>	<u>communications contract, program</u>
<u>34</u>	<u>6</u>	<u>"and" should be "within" instead</u>
<u>99</u>	<u>6</u>	<u>"directory" should be "direct"</u>
<u>118</u>	<u>9</u>	<u>"do-not" should be "do-not-buy"</u>
<u>126</u>	<u>16</u>	<u>"invsice" should be "invoiced"</u>
<u>157</u>	<u>16</u>	<u>"BETT" should be "BET"</u>
<u>285</u>	<u>19</u>	<u>paid media, earned media, and partnership</u>

  
KENDALL OLIPHANT

SUBSCRIBED AND SWORN TO BEFORE ME

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2023.

(NOTARY PUBLIC)

MY COMMISSION EXPIRES:

Job No. CS6031956

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Page 339

1 Rachel Zwolinski, Esq.

2 rachel.zwolinski@usdoj.gov

3 August 10, 2023

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5 8/9/2023, Kendall Oliphant (#6031956)

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23 Veritext Legal Solutions  
24  
25